

**G. S. LONG CO., INC.**

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August 16, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
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Dear Mr. Neal & the National Organic Standards Board,

G.S. Long Co., Inc. is an Agricultural Chemical dealer located in Central Washington State. Genesis Agri Products is a subsidiary of G.S. Long that stables our research and development division and product lines (including some approved for organic production). Between our field consultants and dealer alliances we have a presence on over 200,000 acres consisting primarily of tree fruit and vine (hops and grapes) crops. Although organic production is still a low percentage of our overall business, we see it as a fast growing and very important aspect of our industry as a whole. It is with this in mind that I submit this statement.

This letter is in reference to the National Organic Program, Sunset review, Docket number TM-04-07. G.S. Long Company, Inc. supports the allowance of the following substances found in NOP rule 205.601:

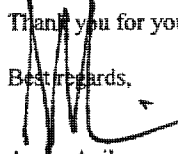
- Lime Sulfur (Calcium Polysulfide).
- Coppers, fixed – copper hydroxide.
- Copper sulfate.
- Oils, horticultural – narrow range oils as dormant, suffocating, and summer oils.
- Pheromones, (passive) for insect management.
- Elemental Sulfur.
- Streptomycin, for fire blight control in apples and pears.
- Lignin sulfonate – chelating agents, dust suppressant.
- Soluble Boron products.
- Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.

These products are used on several thousand acres of tree and vine crops, and are essential tools to combat various fungus, disease, and insect infestations. It is my opinion that the removal of these products would only detour from the ability of our country's organic producers to provide quality fruit to the marketplace. As maintaining a quality product becomes less feasible, growers will be more likely to abandon these principles altogether.

Although production guidelines are of course a necessity; it seems to me that the more restrictive this industry becomes, the less productive it will be.

Thank you for your consideration on these matters.

Best regards,


Aaron Avila
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